

TRANSMITTAL OF APPEAL BRIEF (Large Entity)Docket No.
POU920000086US1

In Re Application Of: Young-Jun Yoon

Application No.	Filing Date	Examiner	Customer No.	Group Art Unit	Confirmation No.
09/867,818	May 30, 2001	S. F. Rayyan	33558	2167	6631

Invention: Multipurpose Web-Enabled Browser

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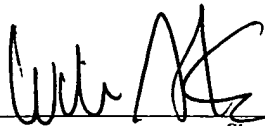
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Transmitted herewith in triplicate is the Appeal Brief in this application, with respect to the Notice of Appeal filed on 05/4/2005.

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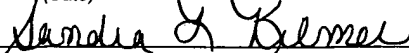
William A. Kinnaman, Jr. - Reg. No. 27,650
IBM Corporation - MS P386
2455 South Road
Poughkeepsie, NY 12601
Phone # (845) 433-1175

Dated: July 5, 2005

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July 5, 2005

(Date)



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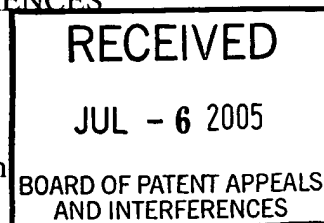
Sandra L. Kilmer

Typed or Printed Name of Person Mailing Correspondence

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PATENT

**IN THE U.S. PATENT AND TRADEMARK OFFICE
BEFORE THE BOARD OF PATENT APPEALS AND INTERFERENCES**



Applicant: YOUNG-JUN YOON : Group Art Unit: 2167
Serial No.: 09/867,818 : Examiner: Susan F. Rayyan
Filed: May 30, 2001 : July 5, 2005
Confirmation No.: 6631 : William A. Kinnaman, Jr.
Title: MULTIPURPOSE WEB-ENABLED : International Business Machines Corporation
BROWSER : 2455 South Road, Mail Station P386
: Poughkeepsie, NY 12601

APPLICANT'S APPEAL BRIEF

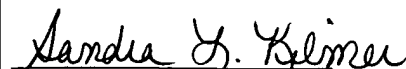
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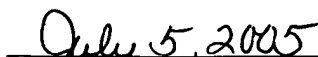
Dear Sir:

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Sandra L. Kilmer


Date: July 5, 2005

REAL PARTY IN INTEREST

The real party in interest is International Business Machines Corporation, the assignee of record.

RELATED APPEALS AND INTERFERENCES

There are no related appeals or interferences.

STATUS OF CLAIMS

Claims 1-30, constituting all pending claims in the application, stand rejected and are on appeal. No claims have been allowed, nor have any claims been cancelled or withdrawn.

STATUS OF AMENDMENTS

A reply after final rejection presenting arguments but not amending the claims was filed March 14, 2005. In an advisory action mailed April 4, 2005, applicant was informed that his reply failed to place the application in allowance.

In addition, an amendment after appeal was filed by facsimile this date, July 5, 2005, seeking to correct certain typographical errors discovered during the preparation of this brief.¹ No indication of whether this amendment has been entered has been received at this time.

SUMMARY OF CLAIMED SUBJECT MATTER

Claims 1, 12 and 20

Claim 1 is directed to apparatus for retrieving data from a selected one of a plurality of databases (accessed, e.g., through server objects 116, 118) in a system (Fig. 1, 100) in which hypertext

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requests are issued from a client side (102) to a server side (106-122). The apparatus comprises a plurality of browser components (Fig. 2, 212, 214, 216) on the server side, each of which is operable to retrieve data from a corresponding one of the databases (page 10, lines 19-24; means for receiving, at a location (MP-WEB servlet 208) on the server side that is common to the databases, a hypertext request (204) from a requester (202) on the client side specifying data contained in one of the databases (Fig. 4, step 402; page 14, lines 6-16; page 15, lines 9-10); and means responsive to receiving the request for directing the request from the common location to the browser component corresponding to the one of the databases to permit the browser component to retrieve the data specified in the request (Fig. 4, step 406; page 15, lines 13-14).

Claim 12 is similar to claim 1 except that it is directed to a method. Claim 20 is similar to claims 1 and 12 except that it is directed to a program storage device.

GROUND OF REJECTION TO BE REVIEWED ON APPEAL

I. Claims 1-5, 12-13 and 20-22 stand rejected under 35 U.S.C. § 102(e) as being anticipated by Weller, U.S. Patent Application Publication 2002/0029272 ("Weller") (Final action, page 2, ¶ 4).

II. Claims 6-8, 14-16 and 23-24 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Weller in view of Borecki et al., U.S. Patent Application Publication 2002/0016749 ("Borecki") (Final action, page 4, ¶ 6).

III. Claims 9, 17 and 25 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Weller in view of Eager et al., U.S. Patent 5,960,200 ("Eager") (Final action, page 5, ¶ 7).

IV. Claims 10, 18 and 26 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Weller in view of Frey et al., U.S. Patent Application Publication 2004/0019898 ("Frey") (Final action, page 5, ¶ 8).

filing is its actual receipt date. Hence, for the purposes of 37 CFR 41.33(a), the amendment after appeal was filed prior to the date this brief was filed.

V. Claims 11, 19 and 27 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Weller in view of Herrendoerfer et al., U.S. Patent 6,473,759 (“Herrendoerfer”) (Final action, page 6, ¶ 9).

ARGUMENT

Claim 1, which is representative of the claims on appeal, reads² as follows:

1. Apparatus for retrieving data from a selected one of a plurality of databases in a system in which hypertext requests are issued from a client side to a server side, said apparatus comprising:
 - a plurality of browser components on said server side, each of which is operable to retrieve data from a corresponding one of said databases;
 - means for receiving, at a location on said server side that is common to said databases, a hypertext request from a requester on said client side specifying data contained in one of said databases; and
 - means responsive to receiving said request for directing said request from said common location to the browser component corresponding to said one of said databases to permit said browser component to retrieve the data specified in said request.

In applicant’s claimed invention, then, a client-side request is received at a common server-side location and from there directed to a corresponding browser component to permit it to retrieve the data specified in the request. While applicant’s invention is not limited to any particular example, in applicant’s disclosed system these browser components include an Interface Repository (IR) browser 212, a Naming browser 214, and a Java class browser 216 (Fig. 2), each of which has a different functionality for interacting with a corresponding database. By providing these browser components on the server side, applicant is able to provide enhanced browser

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functionality while maintaining a “thin” client and without necessitating any changes on the client side (page 4, lines 4-6; page 5, lines 16-23).

Claims 1-5, 12-13 and 20-22 stand rejected under 35 U.S.C. § 102(e) as being anticipated by Weller, while claims 6-11, 14-19 and 23-27 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Weller in combination with the other references noted above.³ Since the rejections of the dependent claims are predicated on the base rejection of claims 1, 12 and 20 as being anticipated by Weller, it is sufficient for our purposes here to address this base rejection.

Weller describes a system for assigning and distributing work over a computer network. In the described system (Fig. 2), customer terminals 30 in a customer pool 12 and agent terminals 36 in a workforce pool 14 are coupled over network interconnections 32 to a web server 34 in an information center 16. Web server 34 provides access to a plurality of different databases 40-54 (Fig. 3) via a customizable user interface 60, which is preferably “an encrypted and password protected web site requiring a user ID to logon” (¶ 40).

In contrast to applicant’s claimed system, however, Weller provides no corresponding browser components to which client-side requests are directed after being received by the user interface 60. Rather, such requests are forwarded directly from the user interface 60 to a particular one of databases 40-54. In terms of applicant’s claim language, Weller does not direct client requests from a common server-side location to a browser component corresponding to the database being accessed.

The Examiner argues⁴ that Weller teaches the limitation of corresponding browser components “in a manner similar to Applicant’s claim language” at paragraph 35, where the inventor states that the web server 34 “can include active server pages, permitting the real time updating of the information from the databases to either the customer or agent terminals 30, 36.” Since this is the

³ The Examiner’s action is incomplete, since it does not address claims 28-30. Applicant will assume for the purposes of this appeal that claims 28-30 are likewise rejected as being anticipated by or unpatentable over Weller.

⁴ Advisory action of April 4, 2005, page 2.

only express reference in the entire publication to active server pages,⁵ it is unclear exactly what the inventor had in mind. In any event, not only is a server page not a “browser component” in any obvious sense, but the fact that such a page is “active” says nothing about whether it corresponds to a particular database. Such an active server page may access multiple databases, while, conversely, multiple active server pages may access a single database.

Accordingly, Weller does not teach directing a client request from a common server-side location to a browser component corresponding to a particular database and thus does not anticipate the subject matter of claims 1-5, 12-13 and 20-22 as amended. Nor, given its failure as a primary reference, does it render obvious the subject matter of the remaining claims on appeal, namely, claims 6-11, 14-19 and 23-30.

⁵ While not using the term “active server page”, Weller also states that the user interface 60 includes “preferably web-based forms linked to the appropriate database so that the information supplied on the form when submitted is written to the appropriate database” (¶ 43). However, there is no suggestion that these forms constitute “browser components” or that they are separate from the interface 60.

Conclusion

For the foregoing reasons, claims 1-30 clearly distinguish over the art cited by the Examiner, and the Examiner's rejection based upon that art is thus untenable. Applicant therefore respectfully requests that the Examiner's rejection be reversed.

Respectfully submitted,

YOUNG-JUN YOON

By

A handwritten signature in black ink, appearing to read 'W.A. Kinnaman, Jr.', is written over a horizontal line.

William A. Kinnaman, Jr.

Registration No. 27,650

Phone: (845) 433-1175

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WAK/wak

CLAIMS APPENDIX

Claims on Appeal⁶

1. Apparatus for retrieving data from a selected one of a plurality of databases in a system in which ~~a~~hypertext requests are issued from a client side to a server side, said apparatus comprising:
 - a plurality of browser components on said server side, each of which is operable to retrieve data from a corresponding one of said databases;
 - means for receiving, at a location on said server side that is common to said databases, a hypertext request from a requester on said client side specifying data contained in one of said databases; and
 - means responsive to receiving said request for directing said request from said common location to the browser component corresponding to said one of said databases to permit said browser component to retrieve the data specified in said request.
2. The apparatus of claim 1 in which said request specifies one of said browser components, said means responsive to receiving said request directing said request to the browser component specified in said request.
3. The apparatus of claim 1 in which said means responsive to receiving said request generates a common portion of a hypertext reply to said requester.
4. The apparatus of claim 3 in which said common portion comprises a header portion.
5. The apparatus of claim 3 in which said common portion comprises a footer portion.
6. The apparatus of claim 1 in which each of said browser components generates a browser-specific portion of a hypertext reply to said requester.

⁶ Strikeouts indicate changes in claims 1, 12 and 20 proposed by amendment after appeal filed July 5, 2005.

7. The apparatus of claim 6 in which each of said browser components has a translator component associated therewith, said translator component intermediating between said browser component and said database and generating a request-specific portion of said browser-specific portion of said hypertext reply to said requester.
8. The apparatus of claim 7 in which said browser component generates a non-request-specific portion of said browser-specific portion of said hypertext reply to said requester.
9. The apparatus of claim 1 in which one of said databases comprises an interface repository.
10. The apparatus of claim 1 in which one of said databases stores naming contexts.
11. The apparatus of claim 1 in which one of said databases stores Java classes.
12. A method for retrieving data from a selected one of a plurality of databases in a system in which a hypertext requests are issued from a client side to a server side, said method comprising the steps of:
 - providing a plurality of browser components on said server side, each of which is operable to retrieve data from a corresponding one of said databases;
 - receiving, at a location on said server side that is common to said databases, a hypertext request from a requester on said client side specifying data contained in one of said databases;
 - and
 - in response to receiving said request, directing said request from said common location to the browser component corresponding to said one of said databases to permit said browser component to retrieve the data specified in said request.
13. The method of claim 12 in which said request specifies one of said browser components and is directed to the browser component specified in said request.

14. The method of claim 12 in which each of said browser components generates a browser-specific portion of a hypertext reply to said requester.
15. The method of claim 14 in which each of said browser components has a translator component associated therewith, said translator component intermediating between said browser component and said database and generating a request-specific portion of said browser-specific portion of said hypertext reply to said requester.
16. The method of claim 15 in which said browser component generates a non-request-specific portion of said browser-specific portion of said hypertext reply to said requester.
17. The method of claim 12 in which one of said databases comprises an interface repository.
18. The method of claim 12 in which one of said databases stores naming contexts.
19. The method of claim 12 in which one of said databases stores Java classes.
20. A program storage device readable by a machine, tangibly embodying a program of instructions executable by the machine to perform method steps for retrieving data from a selected one of a plurality of databases in a system in which a hypertext requests are issued from a client side to a server side, said method steps comprising:
 - providing a plurality of browser components on said server side, each of which is operable to retrieve data from a corresponding one of said databases;
 - receiving, at a location on said server side that is common to said databases, a hypertext request from a requester on said client side specifying data contained in one of said databases;
 - and
 - in response to receiving said request, directing said request from said common location to the browser component corresponding to said one of said databases to permit said browser component to retrieve the data specified in said request.

21. The program storage device of claim 20 in which said request specifies one of said browser components and is directed to the browser component specified in said request.
22. The program storage device of claim 20 in which each of said browser components generates a browser-specific portion of a hypertext reply to said requester.
23. The program storage device of claim 22 in which each of said browser components has a translator component associated therewith, said translator component intermediating between said browser component and said database and generating a request-specific portion of said browser-specific portion of said hypertext reply to said requester.
24. The program storage device of claim 23 in which said browser component generates a non-request-specific portion of said browser-specific portion of said hypertext reply to said requester.
25. The program storage device of claim 20 in which one of said databases comprises an interface repository.
26. The program storage device of claim 20 in which one of said databases stores naming contexts.
27. The program storage device of claim 20 in which one of said databases stores Java classes.
28. The apparatus of claim 1, further comprising means for sending a response back to said requester from said common location.
29. The method of claim 12, further comprising the step of sending a response back to said requester from said common location.

30. The program storage device of claim 12, said method steps further comprising the step of sending a response back to said requester from said common location.

EVIDENCE APPENDIX
(None)

RELATED PROCEEDINGS APPENDIX
(None)

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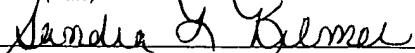
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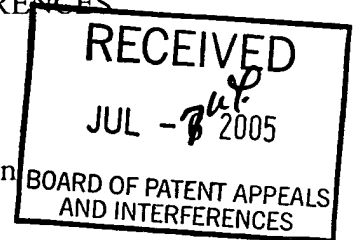
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CC:

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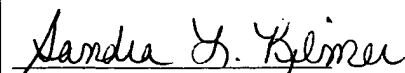
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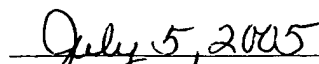
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means for receiving, at a location on said server side that is common to said databases, a hypertext request from a requester on said client side specifying data contained in one of said databases; and

means responsive to receiving said request for directing said request from said common location to the browser component corresponding to said one of said databases to permit said browser component to retrieve the data specified in said request.

In applicant’s claimed invention, then, a client-side request is received at a common server-side location and from there directed to a corresponding browser component to permit it to retrieve the data specified in the request. While applicant’s invention is not limited to any particular example, in applicant’s disclosed system these browser components include an Interface Repository (IR) browser 212, a Naming browser 214, and a Java class browser 216 (Fig. 2), each of which has a different functionality for interacting with a corresponding database. By providing these browser components on the server side, applicant is able to provide enhanced browser

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only express reference in the entire publication to active server pages,⁵ it is unclear exactly what the inventor had in mind. In any event, not only is a server page not a “browser component” in any obvious sense, but the fact that such a page is “active” says nothing about whether it corresponds to a particular database. Such an active server page may access multiple databases, while, conversely, multiple active server pages may access a single database.

Accordingly, Weller does not teach directing a client request from a common server-side location to a browser component corresponding to a particular database and thus does not anticipate the subject matter of claims 1-5, 12-13 and 20-22 as amended. Nor, given its failure as a primary reference, does it render obvious the subject matter of the remaining claims on appeal, namely, claims 6-11, 14-19 and 23-30.

⁵ While not using the term “active server page”, Weller also states that the user interface 60 includes “preferably web-based forms linked to the appropriate database so that the information supplied on the form when submitted is written to the appropriate database” (¶ 43). However, there is no suggestion that these forms constitute “browser components” or that they are separate from the interface 60.

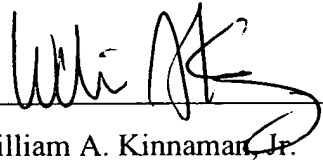
Conclusion

For the foregoing reasons, claims 1-30 clearly distinguish over the art cited by the Examiner, and the Examiner's rejection based upon that art is thus untenable. Applicant therefore respectfully requests that the Examiner's rejection be reversed.

Respectfully submitted,

YOUNG-JUN YOON

By



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WAK/wak

CLAIMS APPENDIX

Claims on Appeal⁶

1. Apparatus for retrieving data from a selected one of a plurality of databases in a system in which ~~a~~ hypertext requests are issued from a client side to a server side, said apparatus comprising:

a plurality of browser components on said server side, each of which is operable to retrieve data from a corresponding one of said databases;

means for receiving, at a location on said server side that is common to said databases, a hypertext request from a requester on said client side specifying data contained in one of said databases; and

means responsive to receiving said request for directing said request from said common location to the browser component corresponding to said one of said databases to permit said browser component to retrieve the data specified in said request.

2. The apparatus of claim 1 in which said request specifies one of said browser components, said means responsive to receiving said request directing said request to the browser component specified in said request.

3. The apparatus of claim 1 in which said means responsive to receiving said request generates a common portion of a hypertext reply to said requester.

4. The apparatus of claim 3 in which said common portion comprises a header portion.

5. The apparatus of claim 3 in which said common portion comprises a footer portion.

6. The apparatus of claim 1 in which each of said browser components generates a browser-specific portion of a hypertext reply to said requester.

⁶ Strikeouts indicate changes in claims 1, 12 and 20 proposed by amendment after appeal filed July 5, 2005.

7. The apparatus of claim 6 in which each of said browser components has a translator component associated therewith, said translator component intermediating between said browser component and said database and generating a request-specific portion of said browser-specific portion of said hypertext reply to said requester.
8. The apparatus of claim 7 in which said browser component generates a non-request-specific portion of said browser-specific portion of said hypertext reply to said requester.
9. The apparatus of claim 1 in which one of said databases comprises an interface repository.
10. The apparatus of claim 1 in which one of said databases stores naming contexts.
11. The apparatus of claim 1 in which one of said databases stores Java classes.
12. A method for retrieving data from a selected one of a plurality of databases in a system in which a hypertext requests are issued from a client side to a server side, said method comprising the steps of:
 - providing a plurality of browser components on said server side, each of which is operable to retrieve data from a corresponding one of said databases;
 - receiving, at a location on said server side that is common to said databases, a hypertext request from a requester on said client side specifying data contained in one of said databases; and
 - in response to receiving said request, directing said request from said common location to the browser component corresponding to said one of said databases to permit said browser component to retrieve the data specified in said request.
13. The method of claim 12 in which said request specifies one of said browser components and is directed to the browser component specified in said request.

14. The method of claim 12 in which each of said browser components generates a browser-specific portion of a hypertext reply to said requester.
15. The method of claim 14 in which each of said browser components has a translator component associated therewith, said translator component intermediating between said browser component and said database and generating a request-specific portion of said browser-specific portion of said hypertext reply to said requester.
16. The method of claim 15 in which said browser component generates a non-request-specific portion of said browser-specific portion of said hypertext reply to said requester.
17. The method of claim 12 in which one of said databases comprises an interface repository.
18. The method of claim 12 in which one of said databases stores naming contexts.
19. The method of claim 12 in which one of said databases stores Java classes.
20. A program storage device readable by a machine, tangibly embodying a program of instructions executable by the machine to perform method steps for retrieving data from a selected one of a plurality of databases in a system in which a hypertext requests are issued from a client side to a server side, said method steps comprising:
 - providing a plurality of browser components on said server side, each of which is operable to retrieve data from a corresponding one of said databases;
 - receiving, at a location on said server side that is common to said databases, a hypertext request from a requester on said client side specifying data contained in one of said databases;
 - and
 - in response to receiving said request, directing said request from said common location to the browser component corresponding to said one of said databases to permit said browser component to retrieve the data specified in said request.

21. The program storage device of claim 20 in which said request specifies one of said browser components and is directed to the browser component specified in said request.
22. The program storage device of claim 20 in which each of said browser components generates a browser-specific portion of a hypertext reply to said requester.
23. The program storage device of claim 22 in which each of said browser components has a translator component associated therewith, said translator component intermediating between said browser component and said database and generating a request-specific portion of said browser-specific portion of said hypertext reply to said requester.
24. The program storage device of claim 23 in which said browser component generates a non-request-specific portion of said browser-specific portion of said hypertext reply to said requester.
25. The program storage device of claim 20 in which one of said databases comprises an interface repository.
26. The program storage device of claim 20 in which one of said databases stores naming contexts.
27. The program storage device of claim 20 in which one of said databases stores Java classes.
28. The apparatus of claim 1, further comprising means for sending a response back to said requester from said common location.
29. The method of claim 12, further comprising the step of sending a response back to said requester from said common location.

30. The program storage device of claim 12, said method steps further comprising the step of sending a response back to said requester from said common location.

EVIDENCE APPENDIX

(None)

RELATED PROCEEDINGS APPENDIX

(None)

TRANSMITTAL OF APPEAL BRIEF (Large Entity)

Docket No.
POU92000086US1

In Re Application Of: Young-Jun Yoon

Application No. 09/867,818	Filing Date May 30, 2001	Examiner S. F. Rayyan	Customer No. 33558	Group Art Unit 2167	Confirmation No. 6631
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Invention: Multipurpose Web-Enabled Browser

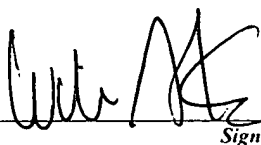
COMMISSIONER FOR PATENTS:

Transmitted herewith in triplicate is the Appeal Brief in this application, with respect to the Notice of Appeal filed on 05/4/2005.

The fee for filing this Appeal Brief is: \$500.00

- ☐ A check in the amount of the fee is enclosed.
- ☒ The Director has already been authorized to charge fees in this application to a Deposit Account.
- ☒ The Director is hereby authorized to charge any fees which may be required, or credit any overpayment to Deposit Account No. 09-0463
- ☐ Payment by credit card. Form PTO-2038 is attached.

WARNING: Information on this form may become public. Credit card information should not be included on this form. Provide credit card information and authorization on PTO-2038.


Signature

William A. Kinnaman, Jr. - Reg. No. 27,650
IBM Corporation - MS P386
2455 South Road
Poughkeepsie, NY 12601
Phone # (845) 433-1175

Dated: July 5, 2005

I hereby certify that this correspondence is being deposited with the United States Postal Service with sufficient postage as first class mail in an envelope addressed to "Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450" [37 CFR 1.8(a)] on

July 5, 2005

(Date)


Signature of Person Mailing Correspondence

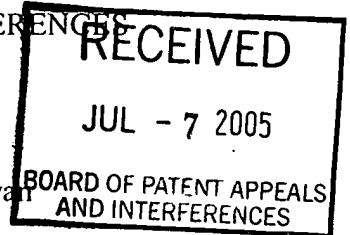
Sandra L. Kilmer

Typed or Printed Name of Person Mailing Correspondence

CC:

PATENT

IN THE U.S. PATENT AND TRADEMARK OFFICE
BEFORE THE BOARD OF PATENT APPEALS AND INTERFERENCES



Applicant: YOUNG-JUN YOON	: Group Art Unit: 2167
Serial No.: 09/867,818	: Examiner: Susan F. Rayyat
Filed: May 30, 2001	: July 5, 2005
Confirmation No.: 6631	: William A. Kinnaman, Jr.
Title: MULTIPURPOSE WEB-ENABLED BROWSER	: International Business Machines Corporation
	: 2455 South Road, Mail Station P386
	: Poughkeepsie, NY 12601

APPLICANT'S APPEAL BRIEF

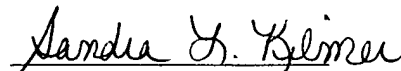
Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

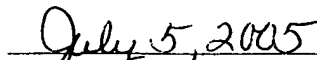
Dear Sir:

Applicant hereby submits his appeal brief in the above-identified application.

CERTIFICATE OF MAILING UNDER 37 CFR 1.8(a)

I hereby certify that this correspondence is being deposited with the United States Postal Service as first-class mail in an envelope addressed to the Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450, on July 5, 2005.


Sandra L. Kilmer


Date: July 5, 2005

REAL PARTY IN INTEREST

The real party in interest is International Business Machines Corporation, the assignee of record.

RELATED APPEALS AND INTERFERENCES

There are no related appeals or interferences.

STATUS OF CLAIMS

Claims 1-30, constituting all pending claims in the application, stand rejected and are on appeal. No claims have been allowed, nor have any claims been cancelled or withdrawn.

STATUS OF AMENDMENTS

A reply after final rejection presenting arguments but not amending the claims was filed March 14, 2005. In an advisory action mailed April 4, 2005, applicant was informed that his reply failed to place the application in allowance.

In addition, an amendment after appeal was filed by facsimile this date, July 5, 2005, seeking to correct certain typographical errors discovered during the preparation of this brief.¹ No indication of whether this amendment has been entered has been received at this time.

SUMMARY OF CLAIMED SUBJECT MATTER

Claims 1, 12 and 20

Claim 1 is directed to apparatus for retrieving data from a selected one of a plurality of databases (accessed, e.g., through server objects 116, 118) in a system (Fig. 1, 100) in which hypertext

¹ This appeal brief is being mailed on the same date, July 5, 2005, with a certificate of mailing under 37 CFR 1.8(a). However, under that rule provision the effective filing date of this brief for all purposes other than timeliness of

requests are issued from a client side (102) to a server side (106-122). The apparatus comprises a plurality of browser components (Fig. 2, 212, 214, 216) on the server side, each of which is operable to retrieve data from a corresponding one of the databases (page 10, lines 19-24; means for receiving, at a location (MP-WEB servlet 208) on the server side that is common to the databases, a hypertext request (204) from a requester (202) on the client side specifying data contained in one of the databases (Fig. 4, step 402; page 14, lines 6-16; page 15, lines 9-10); and means responsive to receiving the request for directing the request from the common location to the browser component corresponding to the one of the databases to permit the browser component to retrieve the data specified in the request (Fig. 4, step 406; page 15, lines 13-14).

Claim 12 is similar to claim 1 except that it is directed to a method. Claim 20 is similar to claims 1 and 12 except that it is directed to a program storage device.

GROUND OF REJECTION TO BE REVIEWED ON APPEAL

I. Claims 1-5, 12-13 and 20-22 stand rejected under 35 U.S.C. § 102(e) as being anticipated by Weller, U.S. Patent Application Publication 2002/0029272 ("Weller") (Final action, page 2, ¶ 4).

II. Claims 6-8, 14-16 and 23-24 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Weller in view of Borecki et al., U.S. Patent Application Publication 2002/0016749 ("Borecki") (Final action, page 4, ¶ 6).

III. Claims 9, 17 and 25 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Weller in view of Eager et al., U.S. Patent 5,960,200 ("Eager") (Final action, page 5, ¶ 7).

IV. Claims 10, 18 and 26 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Weller in view of Frey et al., U.S. Patent Application Publication 2004/0019898 ("Frey") (Final action, page 5, ¶ 8).

filing is its actual receipt date. Hence, for the purposes of 37 CFR 41.33(a), the amendment after appeal was filed prior to the date this brief was filed.

V. Claims 11, 19 and 27 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Weller in view of Herrendoerfer et al., U.S. Patent 6,473,759 (“Herrendoerfer”) (Final action, page 6, ¶ 9).

ARGUMENT

Claim 1, which is representative of the claims on appeal, reads² as follows:

1. Apparatus for retrieving data from a selected one of a plurality of databases in a system in which hypertext requests are issued from a client side to a server side, said apparatus comprising:

a plurality of browser components on said server side, each of which is operable to retrieve data from a corresponding one of said databases;

means for receiving, at a location on said server side that is common to said databases, a hypertext request from a requester on said client side specifying data contained in one of said databases; and

means responsive to receiving said request for directing said request from said common location to the browser component corresponding to said one of said databases to permit said browser component to retrieve the data specified in said request.

In applicant’s claimed invention, then, a client-side request is received at a common server-side location and from there directed to a corresponding browser component to permit it to retrieve the data specified in the request. While applicant’s invention is not limited to any particular example, in applicant’s disclosed system these browser components include an Interface Repository (IR) browser 212, a Naming browser 214, and a Java class browser 216 (Fig. 2), each of which has a different functionality for interacting with a corresponding database. By providing these browser components on the server side, applicant is able to provide enhanced browser

² Applicant is assuming here that the proposed amendment changing “a hypertext requests” in the preamble to “hypertext requests” is being entered.

functionality while maintaining a “thin” client and without necessitating any changes on the client side (page 4, lines 4-6; page 5, lines 16-23).

Claims 1-5, 12-13 and 20-22 stand rejected under 35 U.S.C. § 102(e) as being anticipated by Weller, while claims 6-11, 14-19 and 23-27 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Weller in combination with the other references noted above.³ Since the rejections of the dependent claims are predicated on the base rejection of claims 1, 12 and 20 as being anticipated by Weller, it is sufficient for our purposes here to address this base rejection.

Weller describes a system for assigning and distributing work over a computer network. In the described system (Fig. 2), customer terminals 30 in a customer pool 12 and agent terminals 36 in a workforce pool 14 are coupled over network interconnections 32 to a web server 34 in an information center 16. Web server 34 provides access to a plurality of different databases 40-54 (Fig. 3) via a customizable user interface 60, which is preferably “an encrypted and password protected web site requiring a user ID to logon” (¶ 40).

In contrast to applicant’s claimed system, however, Weller provides no corresponding browser components to which client-side requests are directed after being received by the user interface 60. Rather, such requests are forwarded directly from the user interface 60 to a particular one of databases 40-54. In terms of applicant’s claim language, Weller does not direct client requests from a common server-side location to a browser component corresponding to the database being accessed.

The Examiner argues⁴ that Weller teaches the limitation of corresponding browser components “in a manner similar to Applicant’s claim language” at paragraph 35, where the inventor states that the web server 34 “can include active server pages, permitting the real time updating of the information from the databases to either the customer or agent terminals 30, 36.” Since this is the

³ The Examiner’s action is incomplete, since it does not address claims 28-30. Applicant will assume for the purposes of this appeal that claims 28-30 are likewise rejected as being anticipated by or unpatentable over Weller.

⁴ Advisory action of April 4, 2005, page 2.

only express reference in the entire publication to active server pages,⁵ it is unclear exactly what the inventor had in mind. In any event, not only is a server page not a “browser component” in any obvious sense, but the fact that such a page is “active” says nothing about whether it corresponds to a particular database. Such an active server page may access multiple databases, while, conversely, multiple active server pages may access a single database.

Accordingly, Weller does not teach directing a client request from a common server-side location to a browser component corresponding to a particular database and thus does not anticipate the subject matter of claims 1-5, 12-13 and 20-22 as amended. Nor, given its failure as a primary reference, does it render obvious the subject matter of the remaining claims on appeal, namely, claims 6-11, 14-19 and 23-30.

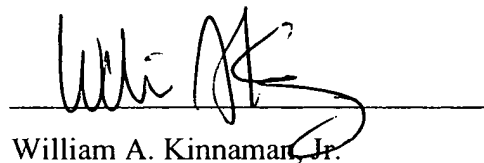
⁵ While not using the term “active server page”, Weller also states that the user interface 60 includes “preferably web-based forms linked to the appropriate database so that the information supplied on the form when submitted is written to the appropriate database” (¶ 43). However, there is no suggestion that these forms constitute “browser components” or that they are separate from the interface 60.

Conclusion

For the foregoing reasons, claims 1-30 clearly distinguish over the art cited by the Examiner, and the Examiner's rejection based upon that art is thus untenable. Applicant therefore respectfully requests that the Examiner's rejection be reversed.

Respectfully submitted,
YOUNG-JUN YOON

By

A handwritten signature in black ink, appearing to read "William A. Kinnaman, Jr.", is written over a horizontal line.

William A. Kinnaman, Jr.

Registration No. 27,650

Phone: (845) 433-1175

Fax: (845) 432-9601

WAK/wak

CLAIMS APPENDIX

Claims on Appeal⁶

1. Apparatus for retrieving data from a selected one of a plurality of databases in a system in which ~~a~~ hypertext requests are issued from a client side to a server side, said apparatus comprising:

a plurality of browser components on said server side, each of which is operable to retrieve data from a corresponding one of said databases;

means for receiving, at a location on said server side that is common to said databases, a hypertext request from a requester on said client side specifying data contained in one of said databases; and

means responsive to receiving said request for directing said request from said common location to the browser component corresponding to said one of said databases to permit said browser component to retrieve the data specified in said request.

2. The apparatus of claim 1 in which said request specifies one of said browser components, said means responsive to receiving said request directing said request to the browser component specified in said request.

3. The apparatus of claim 1 in which said means responsive to receiving said request generates a common portion of a hypertext reply to said requester.

4. The apparatus of claim 3 in which said common portion comprises a header portion.

5. The apparatus of claim 3 in which said common portion comprises a footer portion.

6. The apparatus of claim 1 in which each of said browser components generates a browser-specific portion of a hypertext reply to said requester.

⁶ Strikeouts indicate changes in claims 1, 12 and 20 proposed by amendment after appeal filed July 5, 2005.

7. The apparatus of claim 6 in which each of said browser components has a translator component associated therewith, said translator component intermediating between said browser component and said database and generating a request-specific portion of said browser-specific portion of said hypertext reply to said requester.

8. The apparatus of claim 7 in which said browser component generates a non-request-specific portion of said browser-specific portion of said hypertext reply to said requester.

9. The apparatus of claim 1 in which one of said databases comprises an interface repository.

10. The apparatus of claim 1 in which one of said databases stores naming contexts.

11. The apparatus of claim 1 in which one of said databases stores Java classes.

12. A method for retrieving data from a selected one of a plurality of databases in a system in which a hypertext requests are issued from a client side to a server side, said method comprising the steps of:

providing a plurality of browser components on said server side, each of which is operable to retrieve data from a corresponding one of said databases;

receiving, at a location on said server side that is common to said databases, a hypertext request from a requester on said client side specifying data contained in one of said databases;

and

in response to receiving said request, directing said request from said common location to the browser component corresponding to said one of said databases to permit said browser component to retrieve the data specified in said request.

13. The method of claim 12 in which said request specifies one of said browser components and is directed to the browser component specified in said request.

14. The method of claim 12 in which each of said browser components generates a browser-specific portion of a hypertext reply to said requester.

15. The method of claim 14 in which each of said browser components has a translator component associated therewith, said translator component intermediating between said browser component and said database and generating a request-specific portion of said browser-specific portion of said hypertext reply to said requester.

16. The method of claim 15 in which said browser component generates a non-request-specific portion of said browser-specific portion of said hypertext reply to said requester.

17. The method of claim 12 in which one of said databases comprises an interface repository.

18. The method of claim 12 in which one of said databases stores naming contexts.

19. The method of claim 12 in which one of said databases stores Java classes.

20. A program storage device readable by a machine, tangibly embodying a program of instructions executable by the machine to perform method steps for retrieving data from a selected one of a plurality of databases in a system in which a hypertext requests are issued from a client side to a server side, said method steps comprising:

providing a plurality of browser components on said server side, each of which is operable to retrieve data from a corresponding one of said databases;

receiving, at a location on said server side that is common to said databases, a hypertext request from a requester on said client side specifying data contained in one of said databases; and

in response to receiving said request, directing said request from said common location to the browser component corresponding to said one of said databases to permit said browser component to retrieve the data specified in said request.

21. The program storage device of claim 20 in which said request specifies one of said browser components and is directed to the browser component specified in said request.
22. The program storage device of claim 20 in which each of said browser components generates a browser-specific portion of a hypertext reply to said requester.
23. The program storage device of claim 22 in which each of said browser components has a translator component associated therewith, said translator component intermediating between said browser component and said database and generating a request-specific portion of said browser-specific portion of said hypertext reply to said requester.
24. The program storage device of claim 23 in which said browser component generates a non-request-specific portion of said browser-specific portion of said hypertext reply to said requester.
25. The program storage device of claim 20 in which one of said databases comprises an interface repository.
26. The program storage device of claim 20 in which one of said databases stores naming contexts.
27. The program storage device of claim 20 in which one of said databases stores Java classes.
28. The apparatus of claim 1, further comprising means for sending a response back to said requester from said common location.
29. The method of claim 12, further comprising the step of sending a response back to said requester from said common location.

30. The program storage device of claim 12, said method steps further comprising the step of sending a response back to said requester from said common location.

EVIDENCE APPENDIX

(None)

RELATED PROCEEDINGS APPENDIX
(None)